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Governmental Entities Group*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**FORTY-FIRST MONTHLY FEE STATEMENT OF
CAPLIN & DRYSDALE, CHARTERED, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES WITH
RESPECT TO SERVICES RENDERED AS COUNSEL TO THE
MULTI-STATE GOVERNMENTAL ENTITIES GROUP FOR THE
PERIOD COMMENCING JANUARY 1, 2023, THROUGH JANUARY 31, 2023**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters are located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant: Caplin & Drysdale, Chartered

Authorized to Provide Professional Services to: Multi-State Governmental Entities Group

Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant: April 22, 2021 [Docket No. 2695]

Period for which Compensation and Reimbursement are sought: January 1, 2023, through January 31, 2023

Amount of Compensation sought as actual, reasonable, and necessary: \$17,021.50

Amount of Expense Reimbursement sought as actual, reasonable, and necessary: \$694.60

Total compensation requested in this statement: \$13,617.20 (80% of \$17,021.50)

Total expenses requested in this statement: \$694.60

Total compensation and expenses requested in this statement: \$14,311.80

This is a: X monthly interim final application.

Pursuant to the *Order Authorizing the Debtors to Enter Into Term Sheet With and Pay Certain Fees and Expenses of the Multi-State Governmental Entities Group* [Docket No. 2695] (the “**MSGE Group Fee Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “**Interim Compensation Order**”), the law firm of Caplin & Drysdale, Chartered (“**Caplin & Drysdale**”), hereby submits this Forty-First Monthly Fee Statement (the “**Fee Statement**”) for allowance of compensation for professional legal services rendered as counsel to the Multi-State Governmental Entities Group (“**MSGE Group**”) in the above-captioned case, and reimbursement of actual and necessary expenses incurred, for the period commencing January 1, 2023, through January 31, 2023 (the “**Fee Period**”).

Itemization of Services Rendered and Disbursements Incurred

Attached hereto as **Exhibit A**, is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Fee Period with respect to each of the project categories Caplin & Drysdale established in accordance with its internal billing procedures. As reflected in **Exhibit A**, Caplin & Drysdale rendered 24.6 hours of professional services during the Fee Period, resulting in fees totaling \$17,021.50. Pursuant to this Fee Statement, Caplin & Drysdale seeks reimbursement for 80% of such fees, totaling \$13,617.20.

Attached hereto as **Exhibit B** is a chart of Caplin & Drysdale's professionals and paraprofessionals who rendered services to the MSGE Group in connection with these chapter 11 cases during the Fee Period. This chart includes the title and standard hourly rate for each attorney and paraprofessional, as well as the aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Fee Period is \$845.96. The blended hourly rate of all paraprofessionals is \$424.94. A copy of the computer-generated time entries reflecting all time recorded, organized in project billing categories by Caplin & Drysdale is attached hereto as **Exhibit D**.

Attached hereto as **Exhibit C** is a chart of necessary and out-of-pocket expenses incurred by Caplin & Drysdale in the amount of \$694.60 in connection with providing professional services during the Fee Period and a copy of the computer-generated list of expenses.

Notice

Caplin & Drysdale will provide notice of the Fee Statement in accordance with the Interim Compensation Order.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Fee Statement, serve via email, to the Notice Parties (as defined in the Interim Compensation Order), a written notice setting forth the precise nature of the objection and the amount at issue.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Caplin & Drysdale an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

Dated: March 2, 2023

Respectfully submitted,

/s/ Kevin C. Maclay

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Counsel for the Multi-State

Governmental Entities Group

EXHIBIT A

SUMMARY OF SERVICES BY CATEGORY

JANUARY 1, 2023, THROUGH JANUARY 31, 2023

TASK CODE	PROJECT CATEGORY	TOTAL HOURS	TOTAL FEES
.04	Case Administration	0.8	\$343.50
.07	Fee Applications-Self	4.7	\$2,329.50
.10	Litigation	15.4	\$12,387.00
.15	MSGF Group Meetings/Conferences	0.5	\$697.50
.17	Docket Review & File Maintenance	3.2	\$1,264.00
TOTAL		24.6	\$17,021.50

EXHIBIT B

SUMMARY OF HOURS AND FEES BY PROFESSIONAL

JANUARY 1, 2023, THROUGH JANUARY 31, 2023

Name of Professional	Position/Year Admitted/Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Kevin C. Maclay	Member / 1994 / Bankruptcy	\$1,395.00	2.6	\$3,627.00
Todd E. Phillips	Member / 2005 / Bankruptcy	\$1,050.00	0.2	\$210.00
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$1,125.00	4.4	\$4,950.00
George M. O'Connor	Associate / 2018 / Bankruptcy	\$525.00	8.4	\$4,410.00
Cecilia Guerrero	Paralegal / N/A / Bankruptcy	\$450.00	4.0	\$1,800.00
Jessica A. Giglio	Paralegal / N/A / Bankruptcy	\$450.00	0.9	\$405.00
Rachael L. Davis	Paralegal / N/A / Bankruptcy	\$395.00	4.1	\$1,619.50
TOTAL			24.6	\$17,021.50

EXHIBIT C

SUMMARY OF EXPENSES

JANUARY 1, 2023, THROUGH JANUARY 31, 2023

CATEGORY	AMOUNT
PACER Service	\$694.60
TOTAL	\$694.60

EXHIBIT D

CAPLIN & DRYSDALE

One Thomas Circle NW, Suite 1100
Washington, DC 20005

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

www.capdale.com

Fax: (202) 429-3301

Multi-State Governmental Entities Group

Invoice #: 346766

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RE: Purdue Pharma Bankruptcy Proceeding

For Professional Services Rendered Through January 31, 2023

Total Services	\$17,021.50
Total Disbursements	\$694.60
Total Current Charges	\$17,716.10

Remittance Advice

[Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.](mailto:accounting@capdale.com)

Check Payable To:

Caplin & Drysdale, Chartered
Attn: Accounts Receivable
One Thomas Circle NW, Suite 1100
Washington, DC 20005

Wire Transfer:

Receiving Bank: Bank of America
ABA Wire Routing Number: 026009593
ABA ACH Routing Number: 054001204
Swift Code: BOFAUS3N
Beneficiary: Caplin & Drysdale, Chartered
Account Number: 001920814809

Credit Card:

We accept American Express. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.

Please return this remittance page with your payment. Thank you.

CAPLIN & DRYSDALE

One Thomas Circle NW, Suite 1100
Washington, DC 20005
Federal Tax I.D. No.: 52-1226629

Telephone: (202) 862-5000

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Multi-State Governmental Entities Group

February 28, 2023

Invoice #: 346766

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RE: Purdue Pharma Bankruptcy Proceeding

For Professional Services Rendered Through January 31, 2023

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.04 Case Administration & Calendar Control					
1/24/2023	RLD	Update calendar re upcoming omnibus hearing dates.	0.3	\$395.00	\$118.50
1/27/2023	JAG	Review dockets and update calendar.	0.3	\$450.00	\$135.00
1/29/2023	JAG	Attorney hearing registrations (.1); communications w/ JAL and GMO re same (.1).	0.2	\$450.00	\$90.00
Total			0.80		\$343.50
.07 Fee Applications-Self					
1/5/2023	CG	Draft, revise and finalize monthly fee application (1.4); communications w/ T. Nobis and C. MacDonald re fee-related issues (.2).	1.6	\$450.00	\$720.00
1/6/2023	CG	Communications w/ C. MacDonald re fee-related issues.	0.2	\$450.00	\$90.00
1/8/2023	TEP	Review and edit monthly fee application and communicate w/ JAG re same (.1); confer w/ CG re same (.1).	0.2	\$1,050.00	\$210.00
1/8/2023	CG	Confer w/ TEP re monthly fee app.	0.1	\$450.00	\$45.00
1/8/2023	JAG	Prepare monthly fee statement (.3); communications w/ TEP re same (.1).	0.4	\$450.00	\$180.00
1/16/2023	KCM	Review/edit December monthly fee app.	0.1	\$1,395.00	\$139.50
1/31/2023	CG	Prepare and file monthly fee application and accompanying exhibits (1.8); update fee-related materials re same (.3).	2.1	\$450.00	\$945.00
Total			4.70		\$2,329.50
.10 Litigation					

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
1/11/2023	GMO	Review Lac La Ronge opposition to PI extension and related papers.	1.5	\$525.00	\$787.50
1/17/2023	JAL	Review and analyze draft reply in support of entry of PI against Lac La Ronge Indian Band (2.1); correspondence w/ KCM re same (.3); teleconference w/ KCM re same (.5).	2.9	\$1,125.00	\$3,262.50
1/17/2023	KCM	Review and analyze draft reply in support of entry of PI against Lac La Ronge Indian Band.	0.9	\$1,395.00	\$1,255.50
1/17/2023	KCM	Communications w/ JAL re draft reply in support of entry of PI against Lac La Ronge Indian Band (.3); teleconference w/ JAL re same (.5).	0.8	\$1,395.00	\$1,116.00
1/17/2023	KCM	Teleconference w/ M. Tobak re draft reply in support of entry of PI against Lac La Ronge Indian Band.	0.3	\$1,395.00	\$418.50
1/17/2023	GMO	Review Debtors' draft brief re Lac La Ronge PI objection (.9); review related papers re same (.8).	1.7	\$525.00	\$892.50
1/23/2023	GMO	Review and analyze Canadian first nation's' lift-stay motion and responses (1.4); research re same (.5); prepare for hearing (.2).	2.1	\$525.00	\$1,102.50
1/23/2023	RLD	Hearing prep re 1/24/2023 hearing.	0.3	\$395.00	\$118.50
1/24/2023	JAL	Attend hearing on late-claim motion and Debtors' motion to extend preliminary injunction to Canadian first nation (1.3); review correspondence from the Court, A. Underwood, M. Tobak, and A. Preis re scheduled bench ruling (.2).	1.5	\$1,125.00	\$1,687.50
1/24/2023	GMO	Prepare for hearing (.7); attend hearing (1.3).	2.0	\$525.00	\$1,050.00
1/25/2023	GMO	Research re lift stay motion (.8); review responsive pleadings re same (.3).	1.1	\$525.00	\$577.50
1/31/2023	RLD	Hearing prep re 2/1 bench ruling.	0.3	\$395.00	\$118.50
Total			15.40		\$12,387.00
.15 Committee Meetings/Conferences					
1/17/2023	KCM	Teleconference w/ client re draft reply in support of entry of PI against Lac La Ronge Indian Band.	0.5	\$1,395.00	\$697.50
Total			0.50		\$697.50
.17 Docket Review & File Maintenance					
1/3/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.1	\$395.00	\$39.50
1/5/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.2	\$395.00	\$79.00
1/9/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.2	\$395.00	\$79.00
1/11/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.2	\$395.00	\$79.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.17 Docket Review & File Maintenance					
1/12/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.2	\$395.00	\$79.00
1/13/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.4	\$395.00	\$158.00
1/17/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.2	\$395.00	\$79.00
1/18/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.1	\$395.00	\$39.50
1/19/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.4	\$395.00	\$158.00
1/20/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.1	\$395.00	\$39.50
1/23/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.2	\$395.00	\$79.00
1/24/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.2	\$395.00	\$79.00
1/30/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.4	\$395.00	\$158.00
1/31/2023	RLD	Review docket and update internal files re recently filed pleadings.	0.3	\$395.00	\$118.50
Total			3.20		\$1,264.00
Total Professional Services			24.6		\$17,021.50

PERSON RECAP

Person	Title	Hours	Rate	Amount
JAL Jeffrey A. Liesemer	Member	4.4	\$1,125.00	\$4,950.00
KCM Kevin C. Maclay	Member	2.6	\$1,395.00	\$3,627.00
TEP Todd E. Phillips	Member	0.2	\$1,050.00	\$210.00
GMO George M. O'Connor	Associate	8.4	\$525.00	\$4,410.00
RLD Rachael L. Davis	Paralegal	4.1	\$395.00	\$1,619.50
JAG Jessica A. Giglio	Paralegal	0.9	\$450.00	\$405.00
CG Cecilia Guerrero	Paralegal	4.0	\$450.00	\$1,800.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
01/23/2023	PACER SERVICE CENTER - Pacer Charges - RLD [.11]	\$694.60
Total Disbursements		\$694.60

Total Services	\$17,021.50
Total Disbursements	\$694.60
Total Current Charges	\$17,716.10

TASK RECAP

Services

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
.04	0.80	\$343.50
.07	4.70	\$2,329.50
.10	15.40	\$12,387.00
.15	0.50	\$697.50
.17	3.20	\$1,264.00
	<u>24.60</u>	<u>\$17,021.50</u>

Disbursements

<u>Category</u>	<u>Amount</u>
.11	\$694.60
	<u>\$694.60</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLD Rachael L. Davis	.04	0.30	\$395.00	\$118.50
JAG Jessica A. Giglio	.04	0.50	\$450.00	\$225.00
KCM Kevin C. Maclay	.07	0.10	\$1,395.00	\$139.50
TEP Todd E. Phillips	.07	0.20	\$1,050.00	\$210.00
JAG Jessica A. Giglio	.07	0.40	\$450.00	\$180.00
CG Cecilia Guerrero	.07	4.00	\$450.00	\$1,800.00
JAL Jeffrey A. Liesemer	.10	4.40	\$1,125.00	\$4,950.00
KCM Kevin C. Maclay	.10	2.00	\$1,395.00	\$2,790.00
GMO George M. O'Connor	.10	8.40	\$525.00	\$4,410.00
RLD Rachael L. Davis	.10	0.60	\$395.00	\$237.00
KCM Kevin C. Maclay	.15	0.50	\$1,395.00	\$697.50
RLD Rachael L. Davis	.17	3.20	\$395.00	\$1,264.00
		<u>24.60</u>		<u>\$17,021.50</u>